

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

VICTOR A. BARAKAT

No. 23 CR 89

Hon. John J. Tharp Jr.

**GOVERNMENT'S MOTION FOR EXTENSION
OF TIME TO RESPOND TO DEFENDANT'S PRETRIAL MOTIONS**

The UNITED STATES OF AMERICA, through its attorney, ANDREW S. BOUTROS, United States Attorney for the Northern District of Illinois, respectfully moves for a 28-day extension of time in which to file a response to defendant's pretrial motions. In support thereof, the government states as follows:

1. On July 23, 2025, the Court ordered the government to respond to five pretrial motions filed by defendant (Dkts, 85, 86, 87, 90, and 93) by September 12, 2025.
2. To ensure the government properly and thoroughly addresses the factual and legal issues raised by each of defendant's motions, the government seeks a 28-day extension of time in which to submit its response.

WHEREFORE, the United States respectfully requests leave for a 28-day extension of time from September 12, 2025, to and including October 10, 2025, for the filing of its response to defendant's pretrial motions.

Respectfully submitted,

ANDREW S. BOUTROS
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Date: September 10, 2025